

PrivID	Date	Type	Author	From	To	CC	BCC	Privilege Basis	Privilege Description
PRIV-000003	1/8/2021 21:43	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean			Attorney-Client Privilege;Work Product	Outside counsel for MultiPlan, Melissa Grim, exchanged correspondence with a U.S. Department of Labor investigator concerning requests for information from the DOL to MultiPlan. MultiPlan counsel Marjorie Wilde sent this email chain to MultiPlan employees Mike Schill, Karen Beckstead, and Sean Crandell, with her analysis and instructions. Karen Beckstead replied with her concerns and requested additional instruction
PRIV-000004	1/8/2021 21:12	Email	Beckstead, Karen	Beckstead, Karen	Wilde, Marjorie ESQ.	Crandell, Sean;Schill, Mike		Attorney-Client Privilege;Work Product	Outside counsel for MultiPlan, Melissa Grim, exchanged correspondence with a U.S. Department of Labor investigator concerning requests for information from the DOL to MultiPlan. MultiPlan counsel Marjorie Wilde sent this email chain to MultiPlan employees Mike Schill, Karen Beckstead, and Sean Crandell, with her analysis and instructions. Karen Beckstead replied with her concerns and requested additional instruction
PRIV-000005	1/8/2021 19:38	Email	Beckstead, Karen	Beckstead, Karen	Schill, Mike;Wilde, Marjorie ESQ.	Crandell, Sean		Attorney-Client Privilege;Work Product	Outside counsel for MultiPlan, Melissa Grim, exchanged correspondence with a U.S. Department of Labor investigator concerning requests for information from the DOL to MultiPlan. MultiPlan counsel Marjorie Wilde sent this email chain to MultiPlan employees Mike Schill, Karen Beckstead, and Sean Crandell, with her analysis and instructions. Karen Beckstead replied with her concerns and requested additional instruction
PRIV-000006	1/8/2021 17:58	Email	Beckstead, Karen	Beckstead, Karen	Schill, Mike;Wilde, Marjorie ESQ.	Crandell, Sean		Attorney-Client Privilege;Work Product	Outside counsel for MultiPlan, Melissa Grim, exchanged correspondence with a U.S. Department of Labor investigator concerning requests for information from the DOL to MultiPlan. MultiPlan counsel Marjorie Wilde sent this email chain to MultiPlan employees Mike Schill, Karen Beckstead, and Sean Crandell, with her analysis and instructions. Karen Beckstead replied with her concerns and requested additional instruction
PRIV-000007	2/17/2021 21:30	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Bajjaly, Sarah;Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.

PRIV-000008	2/17/2021 20:56	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Schill, Mike	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.
PRIV-000009	2/18/2021 15:04	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.
PRIV-000010	2/17/2021 23:05	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Bajjaly, Sarah;Schill, Mike	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.

PRIV-000011	2/17/2021 22:44	Email	Bajjaly, Sarah	Bajjaly, Sarah	Schill, Mike;Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.
PRIV-000012	2/18/2021 17:14	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.
PRIV-000013	2/18/2021 15:27	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Schill, Mike	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. At the beginning of this email chain, MultiPlan counsel Marjorie Wilde exchanged correspondence with a DOL investigator concerning information requested by the DOL. Outside counsel for MultiPlan, Melissa Grim, also exchanged correspondence with the DOL investigator concerning information sought and MultiPlan's responses to same. Wilde transmitted one of the DOL's requests to MultiPlan employee Sean Crandell with her impressions and instructions. Wilde later transmitted the email chain to MultiPlan employee Mike Schill with her analysis and inquiries concerning the information sought. Mike Schill and Wilde exchanged emails with additional analysis and impressions.
PRIV-000014	3/10/2021 22:17	Email	Schill, Mike	Schill, Mike	Beckstead, Karen;Crandell, Sean			Attorney-Client Privilege;Work Product	Email chain concerning the request for information by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde exchanged correspondence with outside counsel Melissa Grim concerning impressions of the request and needs in light of same. Wilde also communicated impressions and next steps to certain MultiPlan employees.

PRIV-000015	3/12/2021 15:01	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Schill, Mike	Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain concerning the request for information by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde exchanged correspondence with outside counsel Melissa Grim concerning impressions of the request and needs in light of same. Wilde also communicated impressions and next steps to certain MultiPlan employees.
PRIV-000016	3/10/2021 0:23	Email	Schill, Mike	Schill, Mike	Beckstead, Karen;Crandell, Sean			Attorney-Client Privilege;Work Product	Email chain concerning the request for information by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde exchanged correspondence with outside counsel Melissa Grim concerning impressions of the request and needs in light of same. Wilde also communicated impressions and next steps to certain MultiPlan employees, including Mike Schill, who then wrote to Sean Crandell and Karen Beckstead regarding information sought
PRIV-000017	3/8/2021 22:45	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Schill, Mike	Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain concerning the request for information by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde exchanged correspondence with outside counsel Melissa Grim concerning impressions of the request and needs in light of same. Wilde also communicated impressions and next steps to certain MultiPlan employees.
PRIV-000018	3/8/2021 22:45	Attach						Attorney-Client Privilege;Work Product	Memorandum from outside counsel Melissa Grim to MultiPlan counsel Jeff Doctoroff and Marjorie Wilde concerning U.S. Department of Labor investigation and analysis of same
PRIV-000019	3/19/2021 13:44	Email	Kern, Rebecca	Kern, Rebecca (Paralegal)	Grim, Melissa R. ESQ.	Crandell, Sean;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000020	3/19/2021 13:53	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean;Kern, Rebecca (Paralegal)	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000021	3/30/2021 20:43	Email	Schill, Mike	Schill, Mike	Crandell, Sean			Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call.

PRIV-000022	3/30/2021 20:33	Email	Schill, Mike	Schill, Mike	Crandell, Sean			Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call. Then additional information concerning the inquiries was transmitted using this email chain, including in response to a request made by Marjorie Wilde for specific data with her strategy for use of same.
PRIV-000023	3/30/2021 20:33	Attach	Wilde, Marjorie					Attorney-Client Privilege;Work Product	Spreadsheet of sample claims data and pricing calculations in order to respond to specific questions from U.S. Department of Labor as part of investigation
PRIV-000024	3/19/2021 13:53	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean;Kern, Rebecca (Paralegal)	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000025	3/19/2021 13:47	Email	Kern, Rebecca	Kern, Rebecca (Paralegal)	Grim, Melissa R. ESQ.	Crandell, Sean;Glass, Kim;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000026	3/19/2021 13:53	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean;Kern, Rebecca (Paralegal)	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000027	3/26/2021 11:56	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call. Then additional information concerning the inquiries was transmitted using this email chain, including in response to a request made by Marjorie Wilde for specific data with her strategy for use of same.

PRIV-000028	3/26/2021 11:56	Attach	Wilde, Marjorie					Attorney-Client Privilege;Work Product	Spreadsheet of sample claims data and pricing calculations in order to respond to specific questions from U.S. Department of Labor as part of investigation
PRIV-000029	3/24/2021 16:24	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Schill, Mike	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call. Then additional information concerning the inquiries was transmitted using this email chain, including a request made by Marjorie Wilde for specific data with her strategy for use of same.
PRIV-000029_001	3/24/2021 16:24	Attach	Schill, Mike					Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000029_002	3/24/2021 16:24	Attach	Schill, Mike					Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000029_003	3/24/2021 16:24	Attach	Schill, Mike					Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000029_004	3/24/2021 16:24	Attach	Schill, Mike					Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000029_005	3/24/2021 16:24	Attach	Schill, Mike					Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000029_006	3/24/2021 16:24	Attach	Wilde, Marjorie					Attorney-Client Privilege;Work Product	Spreadsheet prepared in connection with U.S. Department of Labor investigation
PRIV-000030	3/19/2021 13:54	Email	Kern, Rebecca	Kern, Rebecca (Paralegal)	Crandell, Sean;Grim, Melissa R. ESQ.	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain concerning information sought by the U.S. Department of Labor. MultiPlan counsel Marjorie Wilde and outside counsel Melissa Grim exchanged correspondence with the DOL investigator regarding information sought. The latter part of the email chain concerns the scheduling of a call to address information sought.
PRIV-000031	3/17/2021 19:19	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Beckstead, Karen;Crandell, Sean		Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call.

PRIV-000032	3/17/2021 18:14	Email	Schill, Mike	Schill, Mike	Wilde, Marjorie ESQ.	Benesch, William;Crandell, Sean		Attorney-Client Privilege;Work Product	Email chain that originated with a conference invitation from MultiPlan employee Rebecca Kern to MultiPlan counsel Marjorie Wilde, MultiPlan outside counsel (Melissa Grim, Errol King, and Craig Caesar), as well as other MultiPlan employees, to discuss inquiries received from the U.S. Department of Labor. Information concerning the subject of the DOL inquiries was transmitted for use in advance of the conference call
PRIV-000033	3/31/2021 20:16	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean	Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to MultiPlan employee Sean Crandell reflecting advice of Wilde in connection with upcoming call with the U.S. Department of Labor
PRIV-000033_001	3/31/2021 20:16	Attach						Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000033_002	3/31/2021 20:16	Attach						Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000034	3/31/2021 20:16	Attach						Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000035	3/31/2021 20:16	Attach						Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000036	3/31/2021 20:16	Attach						Attorney-Client Privilege;Work Product	Document prepared by outside counsel to assist in responding to U.S. Department of Labor inquiries
PRIV-000037	3/31/2021 20:16	Attach	Wilde, Marjorie					Attorney-Client Privilege;Work Product	Spreadsheet of sample claims data and pricing calculations in order to respond to specific questions from U.S. Department of Labor as part of investigation
PRIV-000038	4/3/2021 19:22	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean	Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Sean Crandell transmitting documents to be utilized by Sean Crandell in preparation for an interview with the U.S. Department of Labor
PRIV-000039	4/3/2021 19:22	Attach						Attorney-Client Privilege;Work Product	Memorandum reflecting legal advice of MultiPlan counsel prepared in anticipation of interview with the U.S. Department of Labor
PRIV-000041	5/2/2017 16:30	Email	McEttrick, Michael	McEttrick, Michael	Beckstead, Karen;Wilde, Marjorie ESQ.	Crandell, Sean;Ralston, Tom		Attorney-Client Privilege;Common Interest;Work Product	E-mail chain between Ms. Wilde and other employees including her impressions and analysis of issues concerning expert's opinions on MultiPlan's pricing methodology and related issues presented in Brand Tarzana litigation involving United
PRIV-000042	4/18/2017 22:16	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Ralston, Tom	Crandell, Sean		Attorney-Client Privilege;Common Interest	E-mail chain between Ms. Wilde and other employees including her impressions and analysis of issues concerning expert's opinions on MultiPlan's pricing methodology and related issues presented in Brand Tarzana litigation involving United

PRIV-000044	12/11/2017 19:01	Email	Moss, JR	Moss, JR	Crandell, Sean;Terry, Veriozka (Paralegal)	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and potential exposure
PRIV-000045	12/18/2020 10:03	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Schill, Mike	Crandell, Sean;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	MultiPlan employee Sean Crandell wrote to MultiPlan counsel Marjorie Wilde, as well as to Mike Schill and Karen Beckstead regarding communication with the U.S. Department of Labor. Wilde later replied to communicate requests received for information from the DOL and my analysis and impressions of the information sought. Wilde then used the same email chain to provide additional analysis and instructions for collecting information to respond to the agency's inquiries. Wilde later used the same email chain to provide analysis and ask questions of Mike Schill and Karen Beckstead concerning information requested. Wilde also wrote about related expert analysis needed in pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000046	12/22/2020 19:26	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean			Attorney-Client Privilege;Work Product	MultiPlan employee Sean Crandell wrote to MultiPlan counsel Marjorie Wilde, as well as to Mike Schill and Karen Beckstead regarding communication with the U.S. Department of Labor. Wilde later replied to communicate requests received for information from the DOL and my analysis and impressions of the information sought. Wilde then used the same email chain to provide additional analysis and instructions for collecting information to respond to the agency's inquiries. Wilde later used the same email chain to provide analysis and ask questions of Mike Schill and Karen Beckstead concerning information requested. Wilde also wrote about related expert analysis needed in pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000047	12/18/2020 14:32	Email	Schill, Mike	Schill, Mike	Beckstead, Karen;Wilde, Marjorie ESQ.	Crandell, Sean;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	MultiPlan employee Sean Crandell wrote to MultiPlan counsel Marjorie Wilde, as well as to Mike Schill and Karen Beckstead regarding communication with the U.S. Department of Labor. Wilde later replied to communicate requests received for information from the DOL and my analysis and impressions of the information sought. Wilde then used the same email chain to provide additional analysis and instructions for collecting information to respond to the agency's inquiries. Wilde later used the same email chain to provide analysis and ask questions of Mike Schill and Karen Beckstead concerning information requested. Wilde also wrote about related expert analysis needed in pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)



PRIV-000048	4/14/2020 14:13	Email	Conway, Christopher	Conway, Christopher ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;McEttrick, Michael;Schill, Mike;Wilde, Marjorie ESQ.	Madarang, Mel;Moss, JR		Attorney-Client Privilege;Work Product	Conference invitation from MultiPlan attorney Christopher Conway to other MultiPlan employees, including Marjorie Wilde and MultiPlan's General Counsel Jeff Doctoroff. The invitation reflects topics to be addressed which are related to a litigated matter (Pacific Recovery Solutions, et al. v. United Behavioral Health, et al.)
PRIV-000049	4/13/2020 21:46	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean;McEttrick, Michael;Schill, Mike	Beckstead, Karen;Conway, Christopher ESQ.;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal);Madarang, Mel;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and the MultiPlan legal department concerning pricing methodology issues. It includes reference by counsel to behavioral health class action suits as well as other potential litigation
PRIV-000050	4/20/2020 14:36	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Conway, Christopher ESQ.;Crandell, Sean;Doctoroff, Jeffrey ESQ.	Beckstead, Karen;McEttrick, Michael;Schill, Mike		Attorney-Client Privilege;Work Product	Email chain which includes conference invitation from MultiPlan attorney Christopher Conway to other MultiPlan employees, including Marjorie Wilde and MultiPlan's General Counsel Jeff Doctoroff. The invitation reflects topics to be addressed which are related to a litigated matter (Pacific Recovery Solutions, et al. v. United Behavioral Health, et al.). A subsequent email from a member of the MultiPlan healthcare economics team provides additional information related to the conference topics that was needed to support consideration of the legal issues.
PRIV-000051	4/13/2020 16:52	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean;McEttrick, Michael;Schill, Mike	Beckstead, Karen;Conway, Christopher ESQ.;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal);Madarang, Mel;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and the MultiPlan legal department concerning pricing methodology issues. It includes reference by counsel to behavioral health class action suits as well as other potential litigation
PRIV-000052	4/13/2020 19:31	Email	McEttrick, Michael	McEttrick, Michael	Crandell, Sean;Schill, Mike;Wilde, Marjorie ESQ.	Beckstead, Karen;Conway, Christopher ESQ.;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal);Madarang, Mel;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and the MultiPlan legal department concerning pricing methodology issues. It includes reference by counsel to behavioral health class action suits as well as other potential litigation
PRIV-000053	4/14/2020 14:55	Email	Conway, Christopher	Conway, Christopher ESQ.	Beckstead, Karen;Crandell, Sean;Doctoroff, Jeffrey ESQ.;Dominy, Susan;McEttrick, Michael;Schill, Mike;Wilde, Marjorie ESQ.	Madarang, Mel;Moss, JR		Attorney-Client Privilege;Work Product	Conference invitation from MultiPlan attorney Christopher Conway to other MultiPlan employees, including Marjorie Wilde and MultiPlan's General Counsel Jeff Doctoroff. The invitation reflects topics to be addressed which are related to a litigated matter (Pacific Recovery Solutions, et al. v. United Behavioral Health, et al.)
PRIV-000054	9/27/2020 2:18	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.;Schill, Mike		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to MultiPlan employee Sean Crandell wherein Wilde provides advice and guidance in advance of Mr. Crandell's interview with the U.S. Department of Labor. Wilde also provides analysis and impressions of the First Amended Complaint filed in Pacific Recovery Solutions, et al. v. United Behavioral Health, et al.

PRIV-000059	8/22/2018 23:54	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.			Attorney-Client Privilege	Email chain originating with request for information from a client needed in advance of a deposition related to Summit Estate. MultiPlan counsel Marjorie Wilde wrote concerning her impressions and analysis of the information sought
PRIV-000095	10/16/2019 18:14	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline;Moss, JR;Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000096	10/16/2019 18:14	Attach	ktimothy					Work Product	Spreadsheet containing research findings on providers involved in In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare
PRIV-000097	9/24/2019 21:18	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.	Kienzle, Jacqueline		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000098	10/29/2019 16:36	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline;Terry, Veriozka (Paralegal)	Kern, Rebecca (Paralegal);Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit. This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena (Spencer Recovery v. United)
PRIV-000100	10/24/2019 23:12	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline;Terry, Veriozka (Paralegal)	Kern, Rebecca (Paralegal);Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit. This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena (Spencer Recovery v. United)

PRIV-000116	10/24/2019 12:18	Email	Edwards, Mark	Edwards, Mark	Terry, Veriozka (Paralegal)			Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit. This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena (Spencer Recovery v. United)
PRIV-000117	9/25/2019 15:39	Email	Edwards, Mark	Edwards, Mark	Butler, Matthew;Colon, Eddie;Smith, Tina			Attorney-Client Privilege;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000118	9/25/2019 15:49	Email	Edwards, Mark	Edwards, Mark	Butler, Matthew;Colon, Eddie;Smith, Tina			Attorney-Client Privilege;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000119	9/25/2019 15:52	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Mays, Scott ESQ.;Moss, JR;Praxmarer, Kathy;Terry, Veriozka (Paralegal)		Attorney-Client Privilege;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000121	9/24/2019 21:09	Email	Edwards, Mark	Edwards, Mark	Butler, Matthew;Colon, Eddie;Smith, Tina			Attorney-Client Privilege;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000122	9/25/2019 16:10	Email	Edwards, Mark	Edwards, Mark	Colon, Eddie	Timothy, Karen		Attorney-Client Privilege;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit. This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena (Spencer Recovery v. United)
PRIV-000124	11/23/2019 18:26	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.	Kienzle, Jacqueline		Attorney-Client Privilege;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting counsel's impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and advice regarding same
PRIV-000128	12/3/2019 0:02	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.	Kern, Rebecca (Paralegal);Kienzle, Jacqueline		Attorney-Client Privilege;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting counsel's impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and advice regarding same

PRIV-000132	11/22/2019 13:47	Email	Edwards, Mark	Edwards, Mark	Moss, JR;Wilde, Marjorie ESQ.	Terry, Veriozka (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting counsel's impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and advice regarding same
PRIV-000137	11/8/2019 21:13	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline			Attorney-Client Privilege;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit)
PRIV-000140	11/21/2019 20:28	Email	Edwards, Mark	Edwards, Mark	Moss, JR;Wilde, Marjorie ESQ.	Terry, Veriozka (Paralegal)		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting counsel's impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and advice regarding same
PRIV-000141	11/19/2019 18:14	Email	Edwards, Mark	Edwards, Mark	Moss, JR			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit)
PRIV-000143	11/22/2019 17:41	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.	Kienzle, Jacqueline		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan legal department reflecting counsel's impressions and analysis of demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and advice regarding same
PRIV-000145	1/10/2020 20:06	Email	Edwards, Mark	Edwards, Mark	Bradley, Jolene			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between MultiPlan employee Mark Edwards and the client, concerning a nonparty subpoena (Spencer Recovery v. United) issued to MultiPlan in a litigated matter involving a client, as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Mark Edwards' email to the client is in an effort to gather information regarding the claims in the lawsuits

PRIV-000146	1/8/2020 19:09	Email	Edwards, Mark	Edwards, Mark	Kienzle, Jacqueline			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000147	1/8/2020 19:09	Attach	Riccobono, Laura					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet reflecting claims data and organized by Plaintiff-Provider prepared in connection with litigation (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)
PRIV-000148	3/25/2020 21:52	Email	Edwards, Mark	Edwards, Mark	Bradley, Jolene			Attorney-Client Privilege;Common Interest;Work Product	Email chain wherein the MultiPlan legal department (specifically, paralegal Veriozka Terry) provided impressions and sought approval of a draft response to a demand letter. The chain reflects the legal department's review of the letter, as well as the draft response (re: Access Ambulatory Surgery Center)
PRIV-000152	3/3/2020 23:17	Email	Edwards, Mark	Edwards, Mark	Bradley, Jolene			Attorney-Client Privilege;Common Interest;Work Product	Email chain wherein the MultiPlan legal department (specifically, paralegal Veriozka Terry) provided impressions and sought approval of a draft response to a demand letter. The chain reflects the legal department's review of the letter, as well as the draft response (re: Access Ambulatory Surgery Center)
PRIV-000157	2/3/2020 15:11	Attach	Kern, Rebecca					Attorney-Client Privilege;Work Product	Email chain that began with transmission of memorandum concerning data preservation in connection with litigation. Mark Edwards and Rebecca Kern then exchanged emails concerning gathering data for use in connection with the litigation ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000159	2/3/2020 15:11	Attach	Riccobono, Laura					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet reflecting claims data and organized by Plaintiff-Provider prepared in connection with litigation (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)

PRIV-000160	1/23/2020 21:50	Email	Edwards, Mark	Edwards, Mark	Sheedy, Sue			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between MultiPlan employee Mark Edwards and the client, concerning a nonparty subpoena (Spencer Recovery v. United) issued to MultiPlan in a litigated matter involving a client, as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Mark Edwards' emails with the client are in an effort to gather information regarding the claims in the lawsuits
PRIV-000161	2/25/2020 21:56	Email	Edwards, Mark	Edwards, Mark	Terry, Veriozka (Paralegal);Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000162	3/11/2020 11:23	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000163	3/4/2020 0:11	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed

PRIV-000164	1/24/2020 19:29	Email	Edwards, Mark	Edwards, Mark	Bradley, Jolene;Olson, Patricia;Sheedy, Susan W.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between MultiPlan employee Mark Edwards and the client, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Mark Edwards' emails with the client are in an effort to gather information regarding the claims in the lawsuits
PRIV-000166	1/27/2020 16:27	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000167	1/27/2020 16:27	Email	Edwards, Mark	Edwards, Mark	Terry, Veriozka (Paralegal)			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000169	2/4/2020 20:49	Attach	Kern, Rebecca					Attorney-Client Privilege;Work Product	Email chain that began with transmission of memorandum concerning data preservation in connection with litigation. Mark Edwards and Rebecca Kern then exchanged emails concerning gathering data for use in connection with the litigation ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000171	2/4/2020 20:49	Attach	Riccobono, Laura					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet reflecting claims data and organized by Plaintiff-Provider prepared in connection with litigation (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)

PRIV-000173	5/5/2020 21:54	Email	Edwards, Mark	Edwards, Mark	Wilde, Marjorie ESQ.			Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000174	5/5/2020 16:53	Email	Edwards, Mark	Edwards, Mark	Beckstead, Karen;McEttrick, Michael;Wilde, Marjorie ESQ.	Armstrong, Monica;Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal);Kienzle, Jacqueline;Schill, Mike		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000175	11/21/2019 19:38	Email	Bradley, Jolene M	Bradley, Jolene	Edwards, Mark	Cox, Kristina A.;Olson, Patricia		Common Interest;Work Product	Communication between MultiPlan and client concerning demand letter (letter from attorney representing a patient regarding claims for surgeries at Bonita Surgical Medical Center and noting attorney's authorization to file suit) and strategy for same
PRIV-000176	3/23/2020 17:07	Email	Terry, Veriozka	Terry, Veriozka (Paralegal)	Dotson, Melissa;Edwards, Mark;King, Errol J. ESQ.;Mannino, Katie ESQ.;Kern, Rebecca (Paralegal);Praxmarer, Kathy;Wilde, Marjorie ESQ.			Attorney-Client Privilege;Work Product	Conference invitation from Veriozka Terry, a paralegal, to Marjorie and others, including MultiPlan's outside counsel (Errol King and Katie Mannino of Phelps Dunbar), to discuss the status of and strategy for pending litigation involving MultiPlan (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and research needed in connection with same
PRIV-000177	4/24/2020 15:55	Email	McEttrick, Michael	McEttrick, Michael	Edwards, Mark;Schill, Mike;Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Kienzle, Jacqueline		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes
PRIV-000178	5/1/2020 15:54	Email	Schill, Mike	Schill, Mike	Edwards, Mark;McEttrick, Michael;Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Kienzle, Jacqueline		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes
PRIV-000179	4/24/2020 15:57	Email	Beckstead, Karen	Beckstead, Karen	Edwards, Mark;McEttrick, Michael;Schill, Mike;Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Kienzle, Jacqueline		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes
PRIV-000180	5/1/2020 17:08	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Dugan, Kim;Edwards, Mark			Attorney-Client Privilege;Work Product	Email chain reflecting correspondence from Marjorie Wilde to Jacqueline Kienzle (copied to the MultiPlan legal team) concerning legal matters involving United



PRIV-000181	5/1/2020 17:08	Attach	MFELLER					Attorney-Client Privilege;Work Product	Spreadsheet reflecting legal impressions and strategy for pending claims and litigated matters that involve United (subpoenas, demand letters, and pending litigation are included--for example, Footprints, Spencer Recovery v. United, and LD, et al. v. United Behavioral Health, et al. are all on the spreadsheet)
PRIV-000182	5/5/2020 16:05	Email	McEttrick, Michael	McEttrick, Michael	Beckstead, Karen;Wilde, Marjorie ESQ.	Armstrong, Monica;Doctoroff, Jeffrey ESQ.;Edwards, Mark;Kern, Rebecca (Paralegal);Kienzle, Jacqueline;Schill, Mike		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000183	5/4/2020 20:11	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;McEttrick, Michael	Armstrong, Monica;Doctoroff, Jeffrey ESQ.;Edwards, Mark;Kern, Rebecca (Paralegal);Kienzle, Jacqueline;Schill, Mike		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000186	5/4/2020 18:46	Email	Doctoroff, Jeff	Doctoroff, Jeffrey ESQ.	Beckstead, Karen;McEttrick, Michael;Wilde, Marjorie ESQ.	Edwards, Mark;Kienzle, Jacqueline;Schill, Mike		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000187	5/4/2020 19:00	Email	Beckstead, Karen	Beckstead, Karen	Doctoroff, Jeffrey ESQ.;McEttrick, Michael;Wilde, Marjorie ESQ.	Edwards, Mark;Kienzle, Jacqueline;Schill, Mike		Attorney-Client Privilege	Email chain concerning pricing methodology and potential changes to same. It reflects the MultiPlan legal department's review of the proposed changes, including the Marjorie Wilde's analysis and impression of proposed changes, as well as the impressions and advice of MultiPlan's General Counsel, Jeff Doctoroff
PRIV-000188	8/22/2018 16:20	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Beckstead, Karen;Dominy, Susan;Edwards, Mark;Moss, JR		Attorney-Client Privilege	Email chain originating with request for information from a client needed in advance of a deposition related to Summit Estate. MultiPlan counsel Marjorie Wilde wrote concerning her impressions and analysis of the information sought
PRIV-000189	8/22/2018 16:20	Attach	nicole.munoz@figdav.com					Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and outside counsel for client concerning arbitration (Victory Mid-Cities) and reflecting MultiPlan's assistance with same
PRIV-000192	8/22/2018 18:43	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Beckstead, Karen;Dominy, Susan;Edwards, Mark;Moss, JR		Attorney-Client Privilege	Email chain originating with request for information from a client needed in advance of a deposition related to Summit Estate. MultiPlan counsel Marjorie Wilde wrote concerning her impressions and analysis of the information sought

PRIV-000198	8/29/2018 15:31	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Edwards, Mark;McEttrick, Michael;Moss, JR;Ralston, Tom;Stanley, Lore		Attorney-Client Privilege;Common Interest	Communication with MultiPlan legal department concerning counsel's impressions of arbitration (Victory Mid-Cities). Marjorie Wilde describes to MultiPlan employees her involvement in the matter and communications with client's outside counsel
PRIV-000201	8/29/2018 15:27	Email	Moss, JR	Moss, JR	Beckstead, Karen;Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Edwards, Mark;Kienzle, Jacqueline;McEttrick, Michael;Ralston, Tom;Stanley, Lore		Attorney-Client Privilege;Common Interest	Communication with MultiPlan legal department concerning counsel's impressions of arbitration (Victory Mid-Cities). Marjorie Wilde describes to MultiPlan employees her involvement in the matter and communications with client's outside counsel
PRIV-000239	5/10/2019 13:42	Email	Conway, Christopher	Conway, Christopher ESQ.	Edwards, Mark			Attorney-Client Privilege;Common Interest	Email chain that began between MultiPlan and United concerning draft language for use in client-facing materials. Draft language was circulated to the MultiPlan legal department for advice. This chain reflects the legal analysis and advice of MultiPlan's legal department concerning draft language and materials.
PRIV-000250	6/18/2019 17:47	Email	Timothy, Karen	Timothy, Karen	Edwards, Mark;Matsis, Lokritia			Attorney-Client Privilege;Common Interest	Email chain containing request by MultiPlan employee for legal advice from MultiPlan counsel Marjorie Wilde regarding information requested concerning client's legal matter. Wilde's advice is also relayed within the chain
PRIV-000254	9/27/2019 17:11	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Altkin, Adam	Edwards, Mark		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit. This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena (Spencer Recovery v. United)
PRIV-000260	10/7/2019 15:29	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Edwards, Mark;Kienzle, Jacqueline;Moss, JR	Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare) and instructs MultiPlan employees regarding initial research needed
PRIV-000261	10/7/2019 15:29	Attach						Attorney-Client Privilege;Work Product	Table of data generated by MultiPlan and utilized in connection with discussion of subpoena (Spencer Recovery v. United) and litigated matter (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)

PRIV-000262	10/7/2019 15:29	Attach	Kern, Rebecca					Common Interest;Work Product	Spreadsheet reflecting details of pending litigation (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare), such as, for example, plaintiffs, defendants, claims, damages sought, etc.
PRIV-000264	10/7/2019 15:29	Attach	Riccobono, Laura					Attorney-Client Privilege;Work Product	Spreadsheet of data generated by MultiPlan and utilized in connection with discussion of subpoena (Spencer Recovery v. United) and litigated matter (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)
PRIV-000265	10/15/2019 19:30	Email	Colon, Eddie	Colon, Eddie	Timothy, Karen	Edwards, Mark		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and counsel for a MultiPlan client, as well as between Marjorie Wilde and MultiPlan employees, concerning a nonparty subpoena issued to MultiPlan in a litigated matter involving a client (Spencer Recovery v. United), as well as related lawsuits filed against MultiPlan, Viant, and the same client (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare). Marjorie Wilde provides her impressions and analysis of the lawsuits and instructs MultiPlan employees regarding initial research needed. MultiPlan employees then exchange emails in efforts to collect information sought
PRIV-000266	10/15/2019 19:30	Attach						Attorney-Client Privilege;Work Product	Table of data generated by MultiPlan and utilized in connection with discussion of subpoena (Spencer Recovery v. United) and litigated matter (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)
PRIV-000268	10/15/2019 19:30	Attach	Riccobono, Laura					Attorney-Client Privilege;Work Product	Spreadsheet of data generated by MultiPlan and utilized in connection with discussion of subpoena (Spencer Recovery v. United) and litigated matter (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)
PRIV-000269	9/24/2019 21:01	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.;Edwards, Mark;Mays, Scott ESQ.;Moss, JR;Praxmarer, Kathy;Terry, Veriozka (Paralegal)		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United)
PRIV-000273	10/15/2019 19:30	Attach	Kern, Rebecca					Common Interest;Work Product	Spreadsheet reflecting details of pending litigation, such as, for example, plaintiffs, defendants, claims, damages sought, etc. (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)

PRIV-000276	10/29/2019 16:06	Email	Butler, Matthew	Butler, Matthew	Edwards, Mark;Smith, Tina			Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a nonparty subpoena received by MultiPlan in a litigated matter involving a client, and reflecting MultiPlan counsel's impressions of the subpoena and underlying lawsuit (Spencer Recovery v. United). This chain also reflects efforts by MultiPlan employees to collect information in response to the subpoena
PRIV-000287	5/6/2020 14:38	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Conway, Christopher ESQ.;Doctoroff, Jeffrey ESQ.;Hunt, Stephanie ESQ.			Attorney-Client Privilege;Common Interest	Email chain that originated with correspondence from United to MultiPlan concerning a draft response to a state agency. The MultiPlan Legal Department was asked to review the response and provide input. MultiPlan attorneys Christopher Conway and Jeff Doctoroff provided their insight and legal advice on the response
PRIV-000288	1/9/2020 22:03	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.			Attorney-Client Privilege;Common Interest	Email chain that originated with United's legal department concerning draft language for communication to United's clients concerning pricing. The email was sent to MultiPlan employee Jacqueline Kienzle from Rebecca Paradise of United with a request to review the proposed language. Jacqueline sent the request to MultiPlan employees, including General Counsel Jeff Doctoroff, for input. Additional correspondence in the chain reflects inquiries of MultiPlan counsel
PRIV-000289	1/7/2020 20:33	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.;McEttrick, Michael	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest	Email chain that originated with United's legal department concerning draft language for communication to United's clients concerning pricing. The email was sent to MultiPlan employee Jacqueline Kienzle from Rebecca Paradise of United with a request to review the proposed language. Jacqueline sent the request to MultiPlan employees, including General Counsel Jeff Doctoroff, for input. Additional correspondence in the chain reflects inquiries of MultiPlan counsel, a response from MultiPlan's healthcare economics team to counsel's inquiry, and additional efforts to gather input on the draft language
PRIV-000291	11/21/2016 21:28	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Beckstead, Karen		Attorney-Client Privilege;Work Product	Email chain between me and MultiPlan employees concerning claims at issue in a lawsuit involving a client for which MultiPlan received a subpoena (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000294	8/8/2017 15:49	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Hunt, Stephanie ESQ.			Attorney-Client Privilege	Email chain between MultiPlan employees and MultiPlan counsel concerning contract negotiations and draft contract language, which reflects discussion of potential legal issues

PRIV-000297	10/17/2017 20:59	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Moss, JR;Patel, Nupa ESQ.;Ralston, Tom		Attorney-Client Privilege;Common Interest	E-mail correspondence originating from United counsel to MultiPlan legal regarding requested declaration needed to support active litigation matter and additional correspondence from MultiPlan legal team regarding the mental impressions and analysis of Ms. Wilde relating to the same (San Joaquin)
PRIV-000298	11/6/2017 16:23	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Johnson, Emma			Attorney-Client Privilege	Email chain wherein MultiPlan employee (now former) Emma Johnson exchanged correspondence with MultiPlan employees, including with members of the MultiPlan Legal Department, concerning the potential existence of legal obligations and compliance with same
PRIV-000299	10/16/2017 15:20	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Johnson, Emma	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest	E-mail chain between Ms. Wilde, Jacqueline Kienzle, and Emma Johnson reflecting Ms. Wilde's communications with United's outside counsel concerning pending litigation with San Joaquin and the potential production of MultiPlan's documents in the same litigation
PRIV-000300	8/15/2017 20:10	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Hunt, Stephanie ESQ.			Attorney-Client Privilege	Email chain between MultiPlan employees and MultiPlan counsel concerning contract negotiations and draft contract language, which reflects discussion of potential legal issues
PRIV-000301	2/12/2018 18:28	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.;Williams, Kevin	Johnson, Emma;Mays, Scott ESQ.;Moss, JR;Robarge, Angela		Attorney-Client Privilege;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000302	1/25/2018 18:02	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Moss, JR;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000303	5/11/2018 17:46	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Moss, JR;Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation and proposal to settle same (Footprints). United asked for a meeting on the issue and the email was then forwarded to MultiPlan employee JR Moss and counsel Marjorie Wilde
PRIV-000304	5/2/2018 23:30	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Paradise, Becky;Bradley, Jolene	Johnson, Emma		Common Interest;Work Product	Email from MultiPlan employee Jacqueline Kienzle to United concerning threatened litigation and proposal to settle same (Footprints)
PRIV-000305	5/2/2018 23:30	Attach	Bramwell, Reeder					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet of claims data prepared at the direction of MultiPlan counsel to resolve dispute (Footprints)
PRIV-000306	5/2/2018 23:30	Attach	Terry, Veriozka					Common Interest;Work Product	Draft agreement for potential use in settling threatened litigation with Footprints

PRIV-000307	4/13/2018 19:13	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Moss, JR;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation and negotiations to settle same (Footprints)
PRIV-000308	5/4/2018 14:52	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Moss, JR;Wilde, Marjorie ESQ.	Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation and proposal to settle same (Footprints). United asked for a meeting on the issue and the email was then forwarded to MultiPlan employee JR Moss and counsel Marjorie Wilde with request for them to attend
PRIV-000309	5/4/2018 15:09	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Moss, JR;Wilde, Marjorie ESQ.	Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation and proposal to settle same (Footprints). United asked for a meeting on the issue and the email was then forwarded to MultiPlan employee JR Moss and counsel Marjorie Wilde with request for them to attend
PRIV-000310	10/30/2018 15:04	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.;Mohler, Susan	Conway, Christopher ESQ.;Mays, Scott ESQ.;Wilde, Marjorie ESQ.		Attorney-Client Privilege	Email chain between MultiPlan counsel Marjorie Wilde and other MultiPlan employees, including General Counsel Jeff Doctoroff, concerning a client's draft plan language. The correspondence contains the analysis and advice of legal counsel on the proposed language.
PRIV-000311	10/30/2018 15:10	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Miller, Lisa			Attorney-Client Privilege	Email chain between MultiPlan counsel Marjorie Wilde and other MultiPlan employees, including General Counsel Jeff Doctoroff, concerning a client's draft plan language. The correspondence contains the analysis and advice of legal counsel on the proposed language.
PRIV-000312	8/24/2021 23:30	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and MultiPlan employees concerning matters in litigation and 30(b)(6) deposition for same ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000313	8/24/2021 23:35	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and MultiPlan employees concerning matters in litigation and 30(b)(6) deposition for same ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000314	8/24/2021 23:38	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and MultiPlan employees concerning matters in litigation and 30(b)(6) deposition for same ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000315	8/25/2021 14:47	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	White, Dale			Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and MultiPlan employees concerning matters in litigation and 30(b)(6) deposition for same ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")

PRIV-000316	8/26/2021 0:54	Email	White, Dale	White, Dale	Kienzle, Jacqueline			Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and MultiPlan employees concerning matters in litigation and 30(b)(6) deposition for same ("In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare")
PRIV-000317	5/7/2021 15:59	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation
PRIV-000319	5/7/2021 16:39	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Smith, Tina			Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation; additional correspondence between MultiPlan employees to collect information sought
PRIV-000321	5/10/2021 18:53	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Edwards, Mark;Smith, Tina			Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation; additional correspondence between MultiPlan employees to collect information sought
PRIV-000323	5/11/2021 14:44	Email	Smith, Tina	Smith, Tina	Edwards, Mark;Kienzle, Jacqueline	Ginther, Bill		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation; additional correspondence between MultiPlan employees to collect information sought
PRIV-000336	5/11/2021 16:20	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Edwards, Mark;Smith, Tina			Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation; additional correspondence between MultiPlan employees to collect information sought
PRIV-000337	5/11/2021 16:50	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Jacqueline Kienzle reflecting request for information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation; additional correspondence between MultiPlan employees to collect information sought
PRIV-000338	5/13/2021 21:19	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and Jacqueline Kienzle reflecting request for and provision of information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation

PRIV-000339	5/13/2021 21:51	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and Jacqueline Kienzle reflecting request for and provision of information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation
PRIV-000340	5/13/2021 21:58	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline			Attorney-Client Privilege;Work Product	Email chain between MultiPlan counsel Marjorie Wilde and Jacqueline Kienzle reflecting request for and provision of information regarding client elections for Viant services for use in connection with U.S. Department of Labor investigation
PRIV-000341	7/29/2021 21:29	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email from counsel Marjorie Wilde to Jacqueline Kienzle requesting review of draft responses to inquiries posed by the U.S. Department of Labor. This email reflects counsel's analysis of issues presented by the inquiries and draft responses.
PRIV-000342	7/29/2021 21:29	Attach						Attorney-Client Privilege;Work Product	Draft responses to inquiries posed by U.S. Department of Labor
PRIV-000343	7/30/2021 17:38	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.	Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and Jacqueline Kienzle requesting review of draft responses to inquiries posed by the U.S. Department of Labor. This chain reflects counsel's analysis of issues presented by the inquiries and draft responses.
PRIV-000344	7/30/2021 17:44	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline			Attorney-Client Privilege;Work Product	Email chain between counsel Marjorie Wilde and Jacqueline Kienzle requesting review of draft responses to inquiries posed by the U.S. Department of Labor. This chain reflects counsel's analysis of issues presented by the inquiries and draft responses.
PRIV-000345	12/31/2019 16:02	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Carlson, Cindy;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Common Interest;Work Product	Communication providing legal advice and analysis of MultiPlan counsel concerning probate matter (Estate of Marcus Booker)
PRIV-000347	1/7/2020 20:19	Email	McEttrick, Michael	McEttrick, Michael	Doctoroff, Jeffrey ESQ.;Kienzle, Jacqueline	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest	Email chain that originated with United's legal department concerning draft language for communication to United's clients concerning pricing. The email was sent to MultiPlan employee Jacqueline Kienzle from Rebecca Paradise of United with a request to review the proposed language. Jacqueline sent the request to MultiPlan employees, including General Counsel Jeff Doctoroff, for input. Additional correspondence in the chain reflects inquiries of MultiPlan counsel, and a response from MultiPlan's healthcare economics team to counsel's inquiry



PRIV-000348	1/17/2020 1:32	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email correspondence from Marjorie Wilde to Jacqueline Kienzle concerning a nonparty subpoena received by MultiPlan. It reflects the actions of outside counsel, as well as Marjorie Wilde's analysis and instructions for collecting information related to the subpoena (Ryan S. v. United HealthGroup, Inc.)
PRIV-000352	1/22/2020 15:29	Email	Kern, Rebecca	Kern, Rebecca (Paralegal)	Kienzle, Jacqueline	Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email correspondence from Marjorie Wilde to Jacqueline Kienzle (and then from paralegal Rebecca Kern to Jacqueline Kienzle) concerning a nonparty subpoena received by MultiPlan. It reflects the actions of outside counsel, as well as Marjorie Wilde's analysis and instructions for collecting information related to the subpoena (Ryan S. v. United HealthGroup, Inc.)
PRIV-000355	4/30/2020 19:30	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Doctoroff, Jeffrey ESQ.;Kern, Rebecca (Paralegal);Mays, Scott ESQ.;O'Neil, Tara ESQ.;Terry, Veriozka (Paralegal)		Attorney-Client Privilege;Work Product	Email chain reflecting correspondence from Marjorie Wilde to Jacqueline Kienzle (copied to the MultiPlan legal team) concerning legal matters involving United
PRIV-000356	4/30/2020 19:30	Attach	MFELLER					Attorney-Client Privilege;Work Product	Spreadsheet reflecting legal impressions and strategy for pending claims and litigated matters (subpoenas, demand letters, and pending litigation are included--for example, Footprints, Spencer Recovery v. United, and LD, et al. v. United Behavioral Health, et al. are all on the spreadsheet)
PRIV-000357	6/22/2017 15:55	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Johnson, Emma;Kienzle, Jacqueline	Patel, Nupa ESQ.		Attorney-Client Privilege	Email chain concerning documents utilized to support pricing recommendations and the protocols for disclosure of same; the chain reflects a request for legal advice by former MultiPlan employee and the provision of legal advice by Marjorie Wilde
PRIV-000359	11/3/2016 13:50	Email	Johnson, Emma	Johnson, Emma	Kienzle, Jacqueline;Moss, JR	Contreras, Veronica ESQ.		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan Legal Department concerning letter from attorney regarding claims and strategy for resolving same (re: Wellington/ UHC)
PRIV-000360	10/24/2016 19:07	Email	Moss, JR	Moss, JR	Johnson, Emma;Kienzle, Jacqueline			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan Legal Department concerning letter from attorney regarding claims and strategy for resolving same (re: Wellington/ UHC)
PRIV-000362	10/25/2016 17:24	Email	Johnson, Emma	Johnson, Emma	Kienzle, Jacqueline;Moss, JR	Contreras, Veronica ESQ.		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan Legal Department concerning letter from attorney regarding claims and strategy for resolving same (re: Wellington/ UHC)
PRIV-000363	11/16/2016 16:39	Email	Johnson, Emma	Johnson, Emma	Kienzle, Jacqueline			Attorney-Client Privilege	Communication reflecting instruction of legal counsel concerning distribution of white papers

PRIV-000364	10/12/2016 17:55	Attach	Bryan Westerfeld					Common Interest;Work Product	Correspondence from Bryan Westerfeld, outside counsel for one of MultiPlan's clients, to Marjorie Wilde concerning pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000370	10/12/2016 17:55	Attach	Wilde, Marjorie					Attorney-Client Privilege;Common Interest;Work Product	Email correspondence between Marjorie Wilde and counsel for one of MultiPlan's clients concerning pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000383	10/12/2016 1:49	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Beckstead, Karen;Crandell, Sean;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting impressions and legal advice of MultiPlan counsel concerning subpoena and pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000384	10/12/2016 1:49	Attach	Bryan Westerfeld					Common Interest;Work Product	Correspondence from Bryan Westerfeld, outside counsel for one of MultiPlan's clients, to Marjorie Wilde concerning pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000390	10/12/2016 1:49	Attach	Wilde, Marjorie					Attorney-Client Privilege;Common Interest	Email correspondence between Marjorie Wilde and counsel for one of MultiPlan's clients concerning pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000402	10/18/2016 19:28	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Westerfeld, Bryan ESQ.	Beckstead, Karen;Benevides, Rosalinda;Daugherty, Linda D.;Kienzle, Jacqueline;Moss, JR		Common Interest;Work Product	Correspondence exchanged between Marjorie Wilde and Bryan Westerfeld, outside counsel for one of MultiPlan's clients, concerning pending litigation and documents related to same (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000406	11/3/2016 21:36	Email	Moss, JR	Moss, JR	Contreras, Veronica ESQ.;Johnson, Emma;Kienzle, Jacqueline			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan employees and MultiPlan Legal Department concerning letter from attorney regarding claims and strategy for resolving same (re: Wellington/ UHC)
PRIV-000407	11/17/2016 17:57	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Moss, JR	Crandell, Sean;Kienzle, Jacqueline;McEttrick, Michael		Attorney-Client Privilege;Common Interest;Work Product	Correspondence exchanged between Marjorie Wilde and Bryan Westerfeld, outside counsel for one of MultiPlan's clients, concerning pending litigation and documents related to same (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.); Marjorie Wilde then forwarded the email chain to MultiPlan employees with her analysis of issues in the litigated matter and with further instruction for data collection
PRIV-000411	11/17/2016 17:57	Attach	Beckstead, Karen					Work Product	Correspondence from MultiPlan employee to Marjorie Wilde concerning provider information pertaining to litigated matter (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)

PRIV-000412	11/17/2016 17:57	Attach	Beckstead, Karen			Crandell, Sean;Kienzle, Jacqueline;McEttrick, Michael		Work Product	Provider list provided to Marjorie Wilde by MultiPlan employee related to pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000415	3/24/2017 21:53	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Moss, JR	Johnson, Emma;Kienzle, Jacqueline;Ralston, Tom		Attorney-Client Privilege;Common Interest	Email chain containing an agenda sent to outside counsel for United pertaining to a matter in litigation (Texas General v. United) and information needed for same
PRIV-000427	3/19/2017 22:04	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean;McEttrick, Michael	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Kienzle, Jacqueline;Ralston, Tom		Attorney-Client Privilege;Common Interest;Work Product	Email from Marjorie Wilde to MultiPlan employees concerning a draft affidavit for a MultiPlan employee intended for use in a lawsuit involving a client (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000428	3/19/2017 22:04	Attach	Terry, Veriozka					Work Product	Draft affidavit of MultiPlan employee for use in pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)
PRIV-000441	4/11/2017 18:41	Attach	Wilde, Marjorie					Attorney-Client Privilege;Common Interest	Communication reflecting impressions and strategy of MultiPlan legal department concerning client's legal matter (Texas General v. United)
PRIV-000469	6/22/2017 15:55	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Johnson, Emma;Kienzle, Jacqueline	Patel, Nupa ESQ.		Attorney-Client Privilege	Email chain concerning documents utilized to support pricing recommendations and the protocols for disclosure of same; the chain reflects a request for legal advice by former MultiPlan employee and the provision of legal advice by Marjorie Wilde
PRIV-000470	6/22/2017 13:40	Email	Johnson, Emma	Johnson, Emma	Kienzle, Jacqueline;Wilde, Marjorie ESQ.			Attorney-Client Privilege	Email chain concerning documents utilized to support pricing recommendations and the protocols for disclosure of same; the chain reflects a request for legal advice by a former MultiPlan employee
PRIV-000471	10/17/2017 20:41	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Moss, JR;Patel, Nupa ESQ.;Ralston, Tom		Attorney-Client Privilege;Common Interest	E-mail correspondence originating from United counsel to MultiPlan legal regarding requested declaration needed to support active litigation matter (San Joaquin) and additional correspondence from MultiPlan legal team regarding the mental impressions and analysis of Ms. Wilde relating to the same
PRIV-000474	10/17/2017 20:41	Attach						Attorney-Client Privilege;Common Interest;Work Product	Draft declaration originating from United counsel to MultiPlan legal needing feedback and comment to support active litigation matter (San Joaquin)
PRIV-000475	10/16/2017 14:03	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline			Attorney-Client Privilege;Common Interest	E-mail chain between Ms. Wilde, Jacqueline Kienzle, and Emma Johnson reflecting Ms. Wilde's communications with United's outside counsel concerning pending litigation with San Joaquin and the potential production of MultiPlan's documents in the same litigation

PRIV-000477	1/2/2018 17:57	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.;Williams, Kevin	Bramwell, Reeder;Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000478	12/27/2017 21:53	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.;Williams, Kevin	Bramwell, Reeder		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000479	1/5/2018 17:47	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.;Williams, Kevin	Bramwell, Reeder;Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000480	1/5/2018 17:47	Attach	Kellie VonWeller					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet of claims information utilized in connection with negotiation efforts to settle threatened litigation (Footprints)
PRIV-000481	1/23/2018 21:01	Email	Moss, JR	Moss, JR	Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Kienzle, Jacqueline;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000483	2/8/2018 16:30	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline;Williams, Kevin	Johnson, Emma;Mays, Scott ESQ.;Moss, JR;Robarge, Angela		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000484	2/8/2018 16:30	Attach	Vera, Irene					Attorney-Client Privilege;Common Interest;Work Product	Draft response to demand letter (Footprints)
PRIV-000487	2/12/2018 18:45	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline;Williams, Kevin	Johnson, Emma;Mays, Scott ESQ.;Moss, JR;Robarge, Angela		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000489	1/24/2018 22:32	Email	Moss, JR	Moss, JR	Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Kienzle, Jacqueline;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000491	2/12/2018 18:07	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline;Williams, Kevin	Johnson, Emma;Mays, Scott ESQ.;Moss, JR;Robarge, Angela		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000492	2/12/2018 18:07	Attach	Vera, Irene					Attorney-Client Privilege;Common Interest;Work Product	MultiPlan counsel Marjorie Wilde's draft response to demand letter (Footprints)
PRIV-000496	1/25/2018 17:43	Email	Moss, JR	Moss, JR	Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Kienzle, Jacqueline;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same

PRIV-000498	4/16/2018 20:41	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000499	4/16/2018 20:41	Attach	Terry, Veriozka					Common Interest;Work Product	Draft agreement for potential use in settling threatened litigation
PRIV-000500	5/4/2018 14:05	Email	Paradise, Rebecca B	Paradise, Rebecca B.	Bradley, Jolene;Kienzle, Jacqueline	Johnson, Emma;Larson, Carolyn S.		Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation (Footprints) and proposal to settle same
PRIV-000501	5/4/2018 15:41	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation (Footprints) and proposal to settle same. United asked for a meeting on the issue and the email was then forwarded to MultiPlan employee JR Moss and counsel Marjorie Wilde with request that they attend
PRIV-000502	5/11/2018 20:58	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	McEttrick, Michael;Ralston, Tom	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Kienzle, Jacqueline;Moss, JR		Attorney-Client Privilege;Common Interest	Communication from MultiPlan counsel Marjorie Wilde concerning anticipated litigation (Footprints) with analysis and next steps in light of same
PRIV-000503	5/11/2018 20:58	Attach	Wilde, Marjorie					Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting legal advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and analysis of potential future issues related to same
PRIV-000504	5/11/2018 20:58	Attach	Wilde, Marjorie					Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting the advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and risks associated with same
PRIV-000505	5/14/2018 14:19	Email	Beckstead, Karen	Beckstead, Karen	McEttrick, Michael;Ralston, Tom;Wilde, Marjorie ESQ.	Doctoroff, Jeffrey ESQ.;Johnson, Emma;Kienzle, Jacqueline;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting the advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and risks associated with same
PRIV-000506	5/14/2018 16:44	Email	McEttrick, Michael	McEttrick, Michael	Ralston, Tom;Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Kienzle, Jacqueline;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting the advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and risks associated with same
PRIV-000507	4/20/2018 21:43	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000508	4/11/2018 21:17	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same

PRIV-000509	5/14/2018 16:52	Email	Ralston, Tom	Ralston, Tom	McEttrick, Michael;Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Kienzle, Jacqueline;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting legal advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and analysis of potential future issues related to same
PRIV-000511	4/13/2018 19:27	Email	Moss, JR	Moss, JR	Bramwell, Reeder;Johnson, Emma;Kienzle, Jacqueline;Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000512	4/13/2018 19:29	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma;Williams, Kevin		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000513	4/20/2018 22:42	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Kienzle, Jacqueline;Moss, JR	Bramwell, Reeder;Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000514	4/20/2018 22:42	Attach	Bramwell, Reeder					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet of claims data prepared at the direction of MultiPlan counsel for use in resolving dispute (Footprints)
PRIV-000515	4/20/2018 22:42	Attach	Terry, Veriozka					Attorney-Client Privilege;Common Interest;Work Product	Draft agreement for potential use in settling threatened litigation (Footprints)
PRIV-000516	5/4/2018 14:54	Email	Johnson, Emma	Johnson, Emma	Kienzle, Jacqueline;Moss, JR;Wilde, Marjorie ESQ.			Attorney-Client Privilege;Common Interest;Work Product	Email between MultiPlan employee Jacqueline Kienzle and United concerning threatened litigation (Footprints) and proposal to settle same. United asked for a meeting on the issue and the email was then forwarded to MultiPlan employee JR Moss and counsel Marjorie Wilde with request to attend
PRIV-000517	4/30/2018 21:36	Email	Moss, JR	Moss, JR	Kienzle, Jacqueline;Wilde, Marjorie ESQ.	Bramwell, Reeder;Johnson, Emma		Attorney-Client Privilege;Common Interest;Work Product	Email chain between MultiPlan Legal Department and MultiPlan employees concerning threatened litigation (Footprints) and negotiations to settle same
PRIV-000518	4/30/2018 21:36	Attach	Bramwell, Reeder					Attorney-Client Privilege;Common Interest;Work Product	Spreadsheet of claims data prepared at the direction of MultiPlan counsel to resolve dispute (Footprints)
PRIV-000519	4/30/2018 21:36	Attach	Terry, Veriozka					Common Interest;Work Product	Draft agreement for potential use in settling threatened litigation (Footprints)
PRIV-000520	5/15/2018 13:43	Email	Ralston, Tom	Ralston, Tom	McEttrick, Michael;Wilde, Marjorie ESQ.	Beckstead, Karen;Doctoroff, Jeffrey ESQ.;Johnson, Emma;Kienzle, Jacqueline;Moss, JR		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting legal advice and analysis of MultiPlan counsel Marjorie Wilde concerning threatened litigation (Footprints) and analysis of potential future issues related to same

PRIV-000521	6/17/2018 19:20	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen	Kienzle, Jacqueline		Attorney-Client Privilege;Common Interest;Work Product	Email chain concerning a draft affidavit for use in a legal matter involving a client (Neil Gilmour, Trustee for the Grantor Trusts of Victory Medical Center Mid-Cities, LP; and Victory Parent Company, LLC v. United Healthcare Services, Inc., et al.). Marjorie Wilde exchanged correspondence with the MultiPlan-employee affiant regarding her affidavit and together they made changes to develop a work product. This email chain reflects the provision of legal advice and strategy for drafting the affidavit and exhibits.
PRIV-000523	6/17/2018 19:20	Attach						Attorney-Client Privilege;Common Interest;Work Product	Draft affidavit of MultiPlan employee with comments reflecting impressions and analysis of issues raised therein prepared for use in Neil Gilmour, Trustee for the Grantor Trusts of Victory Medical Center Mid-Cities, LP; and Victory Parent Company, LLC v. United Healthcare Services, Inc., et al.
PRIV-000525	10/30/2018 15:22	Email	Doctoroff, Jeff	Doctoroff, Jeffrey ESQ.	Kienzle, Jacqueline;Mohler, Susan	Conway, Christopher ESQ.;Mays, Scott ESQ.;Wilde, Marjorie ESQ.		Attorney-Client Privilege	Email chain between MultiPlan counsel Marjorie Wilde and other MultiPlan employees, including General Counsel Jeff Doctoroff, concerning a client's draft plan language. The correspondence contains the analysis and advice of legal counsel on the proposed language.
PRIV-000527	3/12/2019 20:05	Email	Edwards, Mark	Edwards, Mark	Conway, Christopher ESQ.;Mohler, Susan;Wilde, Marjorie ESQ.	Dominy, Susan;Kienzle, Jacqueline		Attorney-Client Privilege;Common Interest	Email chain that began between MultiPlan and United concerning draft language for use in client-facing materials. Draft language was circulated to the MultiPlan legal department for advice. This chain reflects the legal analysis and advice of MultiPlan's legal department concerning draft language and materials.
PRIV-000528	4/3/2019 18:24	Email	Edwards, Mark	Edwards, Mark	Conway, Christopher ESQ.;Mohler, Susan;Wilde, Marjorie ESQ.	Dominy, Susan;Kienzle, Jacqueline;Petrozzelli, Patricia		Attorney-Client Privilege;Common Interest	Email chain that began between MultiPlan and United concerning draft language for use in client-facing materials. Draft language was circulated to the MultiPlan legal department for advice. This chain reflects the legal analysis and advice of MultiPlan's legal department concerning draft language and materials.
PRIV-000529	5/13/2019 20:03	Email	Conway, Christopher	Conway, Christopher ESQ.	Edwards, Mark	Dominy, Susan;Kienzle, Jacqueline;Mohler, Susan;Petrozzelli, Patricia;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest	Email chain that began between MultiPlan and United concerning draft language for use in client-facing materials. Draft language was circulated to the MultiPlan legal department for advice. This chain reflects the legal analysis and advice of MultiPlan's legal department concerning draft language and materials.
PRIV-000530	5/13/2019 19:58	Email	Edwards, Mark	Edwards, Mark	Conway, Christopher ESQ.	Dominy, Susan;Kienzle, Jacqueline;Mohler, Susan;Petrozzelli, Patricia;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Common Interest	Email chain that began between MultiPlan and United concerning draft language for use in client-facing materials. Draft language was circulated to the MultiPlan legal department for advice. This chain reflects the legal analysis and advice of MultiPlan's legal department concerning draft language and materials.

PRIV-000531	11/14/2019 21:01	Email	Cardamone, Anthony	Cardamone, Anthony ESQ.	Mohler, Susan	Dominy, Susan;Dorn, Christopher;O'Neil, Tara ESQ.;Praxmarer, Kathy;Singleton, Bruce		Attorney-Client Privilege	Email chain between MultiPlan counsel and employees concerning draft language regarding pricing methodology. It reflects the provision of legal advice by MultiPlan counsel Anthony Cardamone
PRIV-000533	11/26/2019 17:14	Email	Cardamone, Anthony	Cardamone, Anthony ESQ.	Mohler, Susan;O'Neil, Tara ESQ.			Attorney-Client Privilege	Email chain between MultiPlan counsel and employees concerning draft language regarding pricing methodology. It reflects the provision of legal advice by MultiPlan counsel Anthony Cardamone
PRIV-000535	11/14/2019 21:14	Email	Praxmarer, Kathy	Praxmarer, Kathy	Cardamone, Anthony ESQ.;Mohler, Susan	Dominy, Susan;Dorn, Christopher;Singleton, Bruce		Attorney-Client Privilege	Communication to MultiPlan counsel and other employees regarding draft document concerning pricing methodologies
PRIV-000537	11/20/2019 15:17	Email	Cardamone, Anthony	Cardamone, Anthony ESQ.	Mohler, Susan;Praxmarer, Kathy	Dominy, Susan;Dorn, Christopher;O'Neil, Tara ESQ.;Singleton, Bruce		Attorney-Client Privilege	Email chain between MultiPlan counsel and employees concerning draft language regarding pricing methodology. It reflects the provision of legal advice by MultiPlan counsel Anthony Cardamone
PRIV-000540	9/26/2018 15:09	Email	Mohler, Susan	Mohler, Susan	Wilde, Marjorie ESQ.	Beckstead, Karen;McEttrick, Michael;Moss, JR;Ralston, Tom		Attorney-Client Privilege	E-mail chain between Ms. Wilde and multiple Multiplan employees reflecting Ms. Wilde's impressions and others' responses on updating language in methodology documents and appropriateness of distributing such documents in certain litigation
PRIV-000550	10/30/2018 15:22	Email	Doctoroff, Jeff	Doctoroff, Jeffrey ESQ.	Kienzle, Jacqueline;Mohler, Susan	Conway, Christopher ESQ.;Mays, Scott ESQ.;Wilde, Marjorie ESQ.		Attorney-Client Privilege	Email chain between MultiPlan counsel Marjorie Wilde and other MultiPlan employees, including General Counsel Jeff Doctoroff, concerning a client's draft plan language. The correspondence contains the analysis and advice of legal counsel on the proposed language.
PRIV-000551	11/2/2018 21:45	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Armstrong, Monica	Conway, Christopher ESQ.;Mohler, Susan;Williams, Kevin		Attorney-Client Privilege	E-mail chain between Ms. Wilde and MultiPlan employee Monica Armstrong and others reflecting legal instructions and analysis relating to a recently received subpoena and the disclosure of materials utilized to support pricing methodology in connection with litigation.
PRIV-000553	11/2/2018 21:45	Attach	Moss, JR					Attorney-Client Privilege	Email chain requesting advice from Marjorie Wilde concerning provision of information to Cigna in connection with Brand Tarzana
PRIV-000556	10/2/2017 19:19	Email	Doctoroff, Jeffrey ESQ.	Doctoroff, Jeffrey ESQ.	Mohler, Susan			Attorney-Client Privilege	Email correspondence between MultiPlan employee and MultiPlan counsel wherein MultiPlan employee requests legal review of attached documents
PRIV-000559	6/11/2018 12:03	Email	Mohler, Susan	Mohler, Susan	Wilde, Marjorie ESQ.			Attorney-Client Privilege	E-mails between Ms. Wilde and Susan Mohler concerning Ms. Wilde's legal analysis and advice on changes and issues presented in draft revisions to pricing methodology documents.



PRIV-000560	6/10/2018 17:57	Email	Mohler, Susan	Mohler, Susan	Wilde, Marjorie ESQ.			Attorney-Client Privilege	E-mails between Ms. Wilde and Susan Mohler concerning Ms. Wilde's legal analysis and advice on changes and issues presented in draft revisions to pricing methodology documents
PRIV-000561	6/10/2018 21:44	Email	Mohler, Susan	Mohler, Susan	Wilde, Marjorie ESQ.			Attorney-Client Privilege	E-mails between Ms. Wilde and Susan Mohler concerning Ms. Wilde's legal analysis and advice on changes and issues presented in draft revisions to pricing methodology documents
PRIV-000562	6/10/2018 17:31	Email	Mohler, Susan	Mohler, Susan	Wilde, Marjorie ESQ.			Attorney-Client Privilege	E-mails between Ms. Wilde and Susan Mohler concerning Ms. Wilde's legal analysis and advice on changes and issues presented in draft revisions to pricing methodology documents
PRIV-000563	6/10/2018 17:33	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Mohler, Susan			Attorney-Client Privilege	E-mails between Ms. Wilde and Susan Mohler concerning Ms. Wilde's legal analysis and advice on changes and issues presented in draft revisions to pricing methodology documents
PRIV-000564	7/25/2018 13:32	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Mohler, Susan	Beckstead, Karen;McEttrick, Michael;Moss, JR;Ralston, Tom		Attorney-Client Privilege	E-mail chain between Ms. Wilde and multiple Multiplan employees reflecting Ms. Wilde's impressions on updating language in methodology documents and appropriateness of distributing such documents in certain litigation
PRIV-000577	4/3/2021 19:22	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean	Doctoroff, Jeffrey ESQ.;Grim, Melissa R. ESQ.		Attorney-Client Privilege;Work Product	Email from MultiPlan counsel Marjorie Wilde to Sean Crandell transmitting documents to be utilized by Sean Crandell in preparation for an interview with the U.S. Department of Labor
PRIV-000578	4/3/2021 19:22	Attach						Attorney-Client Privilege;Work Product	Memorandum reflecting legal advice of MultiPlan counsel prepared in anticipation of interview with the U.S. Department of Labor
PRIV-000580	4/8/2021 22:33	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Schill, Mike	Crandell, Sean;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain that originated as a request from the U.S. Department of Labor to MultiPlan outside counsel Melissa Grim for information. MultiPlan counsel Marjorie Wilde was cc'd on the original email and forwarded it to certain MultiPlan employees with her impressions and instructions related to the request for information.
PRIV-000581	4/12/2021 15:32	Email	Schill, Mike	Schill, Mike	Beckstead, Karen;Wilde, Marjorie ESQ.	Crandell, Sean;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain that originated as a request from the U.S. Department of Labor to MultiPlan outside counsel Melissa Grim for information. MultiPlan counsel Marjorie Wilde was cc'd on the original email and forwarded it to certain MultiPlan employees with her impressions and instructions related to the request for information

PRIV-000582	4/12/2021 16:02	Email	Beckstead, Karen	Beckstead, Karen	Schill, Mike;Wilde, Marjorie ESQ.	Crandell, Sean;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain that originated as a request from the U.S. Department of Labor to MultiPlan outside counsel Melissa Grim for information. MultiPlan counsel Marjorie Wilde was cc'd on the original email and forwarded it to certain MultiPlan employees with her impressions and instructions related to the request for information; those employees responded with their impressions
PRIV-000583	4/30/2021 15:42	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal);Schill, Mike		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000584	4/30/2021 15:48	Email	Crandell, Sean	Crandell, Sean	Wilde, Marjorie ESQ.	Beckstead, Karen;Conway, Christopher ESQ.;Grim, Melissa R. ESQ.;Kern, Rebecca (Paralegal);Schill, Mike		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000585	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000586	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000587	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)

PRIV-000588	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000589	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000590	4/30/2021 16:04	Email	Grim, Melissa R.	Grim, Melissa R. ESQ.	Crandell, Sean	Beckstead, Karen;Conway, Christopher ESQ.;Kern, Rebecca (Paralegal);Schill, Mike;Wilde, Marjorie ESQ.		Attorney-Client Privilege;Work Product	Email chain wherein counsel Marjorie Wilde, as well as outside counsel Melissa Grim, are analyzing pricing methodology issues and drafting responses to inquiries from the U.S. Department of Labor with the assistance of MultiPlan employees. Some of the issues discussed were also relevant to pending litigation (LD, et al. v. United Behavioral Health, Inc., et al./RJ, et al. v. Cigna Health and Life Insurance Co., et al.)
PRIV-000593	8/2/2016 22:25	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Bandomer, Mike;Christ, LeeAnn Solomon ESQ.;Mohler, Susan;Ralston, Tom	Ralston, Tom		Attorney-Client Privilege	Conference invitation from Ms. Wilde to other employees that contain Ms. Wilde's legal analysis and impressions of certain documents under revision
PRIV-000607	8/2/2016 22:25	Attach	Wilde, Marjorie					Attorney-Client Privilege	E-mail from MultiPlan employee to Ms. Wilde seeking her analysis and legal impressions on certain drafts of letters to providers
PRIV-000610	8/21/2016 21:31	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Mohler, Susan;Ralston, Tom	Christ, LeeAnn Solomon ESQ.;Doctoroff, Jeffrey ESQ.;McEttrick, Michael;St. Germain, Vickie ESQ.		Attorney-Client Privilege	E-mail chain between Ms. Wilde and multiple Multiplan employees reflecting Ms. Wilde's impressions and legal advice on distribution of certain documents to clients and impressions or needs for updating additional documents
PRIV-000612	10/2/2020 14:08	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen;Cardamone, Anthony ESQ.;O'Neil, Tara ESQ.;Schill, Mike	Crandell, Sean;Kern, Rebecca (Paralegal)		Attorney-Client Privilege;Work Product	Email chain between the MultiPlan legal department, including Marjorie Wilde and MultiPlan attorneys Anthony Cardamone and Tara O'Neil, and other MultiPlan employees concerning pricing methodology issues which were pertinent to both pending litigation and inquiries from the U.S. Department of Labor
PRIV-000631	12/1/2021 22:23	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Hunt, Stephanie ESQ.			Attorney-Client Privilege	Email chain between MultiPlan employees and outside counsel to provide documents to counsel to assist in In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare

PRIV-000633	12/16/2021 18:03	Email	Kienzle, Jacqueline	Kienzle, Jacqueline	Wilde, Marjorie ESQ.			Attorney-Client Privilege;Work Product	Correspondence containing notes regarding deposition preparation meeting (In re: Out of Network Substance Use Disorder Claims against UnitedHealthcare)
MPI-0008246	10/12/2016 17:55	Email	Wilde, Marjorie	Wilde, Marjorie ESQ.	Beckstead, Karen	Kienzle, Jacqueline		Attorney-Client Privilege;Common Interest;Work Product	Email chain reflecting impressions and legal advice of MultiPlan counsel concerning subpoena and pending litigation (Brand Tarzana Surgical Institute Inc. v. United Health Group Inc., et. al.)